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SOUTH CAROLINA PUBLIC SERVICE

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June 30, 2014

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Annual ETC Reports: Information Required to be Filed in
WC Docket No. 10-90 with the FCC, USAC, and State
Commissions pursuant to 47 C.F.R. §§ 54.313 and 54.422

Dear Ms. Boyd:

Enclosed for filing on behalf of the South Carolina Telephone Coalition companies and affiliated eligible telecommunications carriers ("ETCs") (see attached list), please find copies of FCC Form 481 and accompanying information for each of the companies. Federal Communications Commission ("FCC") regulations require all ETCs who receive federal high cost or low income support to file reports containing this information on an annual basis ("Annual ETC Reports") with the FCC, the Administrator of the Universal Service Administrative Company ("USAC"), and the relevant state commission.¹ See 47 C.F.R. § 54.313(i); § 54.422(c). The FCC requires that this information be filed using FCC Form 481.

These Annual ETC Reports are being filed with the FCC and USAC for review in connection with the federal Connect America Fund. While the FCC rules state that a copy must be provided to the state commission, the Commission is not required or asked to take any action at this time. Therefore, we are providing these reports for information purposes only.

Please note that these Annual ETC Reports contain confidential information regarding the companies' finances, operations, service outages, build-out plans, and customer service issues. A motion for confidential treatment of these materials accompanies this filing. Because of the large size of this filing,

¹ Comporium, Inc. was also required to file a copy with the relevant Tribal authority, which it has done.

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Ms. Jocelyn Boyd
June 30, 2014
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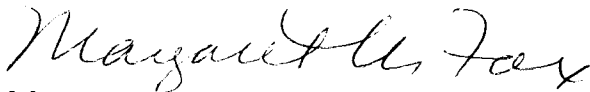
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we are providing it to the Commission on CD-ROM. A public redacted version of the filing on CD-ROM is attached. A confidential version is being provided to the Commission in a sealed envelope, in accordance with the Commission's procedures.

Thank you for your assistance. If you should have any questions, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A



Margaret M. Fox

MMF:rwm
Enclosures

cc: Nanette S. Edwards, Esquire, ORS

South Carolina Telephone Coalition Member Companies and Affiliated ETCs

<u>Eligible Telecommunications Carrier</u>	<u>Study Area Code (SAC)</u>
✓Bluffton Telephone Company, Inc.	240512
✓Chesnee Telephone Company	240515
✓Chester Telephone Company d/b/a TruVista	240516
✓Farmers Telephone Cooperative, Inc.	240520
✓FTC Communications, LLC†	249002
✓Ft. Mill Telephone Company d/b/a Comporium	240521
✓Hargray Telephone Company, Inc.	240523
✓Home Telephone ILEC, LLC d/b/a Home Telecom	240527
✓Horry Telephone Cooperative, Inc.	240528
✓Lancaster Telephone Company d/b/a Comporium	240531
✓Lockhart Telephone Company d/b/a TruVista	240532
✓McClellanville Telephone Company (TDS) †††	240533
✓Norway Telephone Company (TDS) †††	240535
✓Palmetto Rural Telephone Cooperative, Inc.	240536
✓Palmetto Telephone Communications, LLC (Lifeline only)††	249023
✓Piedmont Rural Telephone Cooperative, Inc.	240538
✓PBT Telecom d/b/a Comporium	240539
✓Ridgeway Telephone Company d/b/a TruVista	240541
✓Rock Hill Telephone Company d/b/a Comporium	240542
✓Sandhill Telephone Cooperative, Inc.	240546
✓St. Stephen Telephone Company (TDS) †††	240544
✓West Carolina Rural Telephone Cooperative, Inc.	240550
✓Williston Telephone Company (TDS) †††	240551

† Wireless competitive ETC

†† Lifeline only ETC

††† Public company

All other companies are privately held rate-of-return carriers

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SC PUBLIC SERVICE
COMMISSION

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Re: Annual ETC Reports: Information Required to be Filed)
in WC Docket No. 10-90 with the FCC, USAC, and State)
Commissions pursuant to 47 C.F.R. §§ 54.313 and 54.422)
_____)

MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL

The South Carolina Telephone Coalition (see attached list of companies) (“SCTC”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost or low income support are required to file annual reports (“Annual ETC Reports”) pursuant to 47 C.F.R. §§ 54.313 and 54.422 with the Federal Communications Commission (“FCC”), the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *See* 47 C.F.R. § 54.313(i); § 54.422(c). The Annual ETC Reports are required to be filed on FCC Form 481, with attached materials.

2. The Annual ETC Reports for certain companies include detailed information on reported outages the ETC experienced in the prior calendar year, as required by 47 C.F.R. §

54.313(a)(2). This information is entitled to confidential treatment pursuant to 47 C.F.R. §§ 4.2 and 0.457(d)(vi), and Commission Order No. 2006-777 in Docket No. 2006-371-C.

3. The Annual ETC Reports for the privately-held rate of return companies (see attached list) include full and complete annual reports of the companies' financial condition and operations as of the end of the preceding fiscal year, as required by 47 C.F.R. § 54.313(f)(2). The FCC has recognized that there is a potential for competitors to use the submitted financial data of private rural rate-of-return carriers in an anticompetitive manner, and has allowed privately held ETCs to file the required financial data subject to a Protective Order. *See Connect America Fund et al.*, WC Docket No. 10-90 et al., Fifth Order on Reconsideration, at para. 15 (rel. November 16, 2012); Protective Order, DA 12-1857 (Wireline Comp. Bureau, rel. November 16, 2012). For the same reason cited by the FCC, the companies' detailed financial information is entitled to protection as confidential information at the state level. This information contains confidential, proprietary, competitively-sensitive business and financial information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

4. Beginning with the 2014 filing, the Annual ETC Reports also are required to include a five-year network improvement plan consistent with the requirements of 47 C.F.R. § 54.202(a)(1)(ii).¹ This information contains confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies.

¹ See 47 C.F.R. §54.313(a)(1).

Protection of such confidential and proprietary information is consistent with Commission precedent.


5. The Annual ETC Reports for McClellanville Telephone Company, Norway Telephone Company, St. Stephen Telephone Company, and Williston Telephone Company include information regarding the number of service outages, unfulfilled service requests, and consumer complaints that are considered confidential and proprietary to the companies. The companies have filed this information with the FCC on a confidential basis pursuant to 47 C.F.R. § 0.457(d) on the grounds that the information is competitively sensitive and not routinely available for public inspection. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies.

6. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

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Email: jbowen@mcnair.net; pfox@mcnair.net

By: 
M. John Bowen, Jr.
Margaret M. Fox

ATTORNEYS FOR THE SOUTH CAROLINA
TELEPHONE COALITION

Columbia, South Carolina
June 30, 2014

South Carolina Telephone Coalition Member Companies and Affiliated ETCs

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